US EPA RECORDS CENTER REGION 5
470351

May 24, 2012

Submitted Via Federal Express

Mr. W. Owen Thompson Remedial Project Manager Superfund Remedial Response Section Seven U.S. EPA Region 5, SR-6J 77 W. Jackson Blvd. Chicago, IL 60604

Subject:

Results of Additional Soil Borings Investigation

Detrex Source Control Area – Fields Brook Superfund Site

Detrex Corporation, Ashtabula, Ohio

Docket No. V-W-98-C-450

Dear Mr. Thompson:

On behalf of Detrex Corporation, URS Corporation (URS) is submitting the results obtained from the Additional Soil Boring Investigation that was recently completed at the Detrex Facility. This work was completed in order to collect additional data to better understand the occurrence of DNAPL in the subsurface at the Detrex Facility. On April 6, 2012, Detrex, USEPA, and URS had a teleconference call to discuss the results of the MIP Investigation completed in early March 2012. During the April 6, 2012 meeting, Ohio EPA and USEPA requested additional soil borings in the former lagoon to evaluate subsurface occurrence of DNAPL in both natural soils and fill located in the former lagoon area. At that time, Detrex suggested that USEPA, Ohio EPA and its subcontractors be available for a technical meeting and be present during additional DNAPL delineation investigations. This meeting was scheduled for May 1 and 2, 2012.

On April 30, 2012, URS submitted a letter report describing the results of the MIP / Soil Boring Investigation completed in March 2012. During the meeting on May 1, 2012, all parties reviewed information presented during the April teleconference call regarding the updated Site Conceptual Model and DNAPL occurrence. In addition, the group collaboratively selected additional soil boring locations that would be drilled to assess DNAPL occurrence and evaluate geologic materials in reference to location of former lagoons, placement of potential DNAPL recovery wells and the ability to extract groundwater and DNAPL.

1.0 Soil Boring Investigation Results

During the two day sampling program, fourteen (14) soil borings were completed within various areas at the Detrex Facility, which included the following: previous MIP locations not sampled in March 2012; areas outside of plant operations, and areas within the northeastern portion of the facility where the former lagoons where located. **Figure 1** provides an updated

URS Corporation 1375 Euclid Avenue Suite 600 Cleveland, OH 44115 Tel: 216.622.2400 Fax: 216.622.2464 www.urscorp.com

Mr. W. Owen Thompson United States Environmental Protection Agency May 24, 2012 Page 2 of 4

drawing to shown locations of all MIP and soil boring locations. This figure also shows the approximate boundaries of the former lagoons in the northeast portion of the facility. The approximate locations of the former lagoon boundaries were based on a historical air photograph from the area circa 1955-1960. A copy of this photograph is provided in **Appendix A. Figure 1** also shows the locations of geologic cross sections A-A' and B-B', which are attached as **Figures 2** and **3**, respectively.

During the May 1-2, 2012 investigation, soil borings were completed in areas of the facility that were either underlain by natural soils (i.e. undisturbed areas) or in areas underlain by backfill soils placed in the former lagoon area. Based on detailed geologic descriptions from the continuously sampled geoprobe locations, four (4) sampling locations were located in undisturbed areas (GP MW-10, GP 21, 28, and 36) and ten (10) were located in backfilled lagoon areas (GP 10, 48, 49, 6, 7, 11, 16, 20, 25, and 7). The individual boring logs are provided in **Appendix B**.

1.1 Site Conceptual Model

In the April 30, 2012 MIP/Soil Boring Investigation letter report submitted to USEPA, a revised Site Conceptual Model (SCM) was developed. The soil boring data collected during May 1-2, 2012 additional sampling program has subsequently been used to update the existing geologic cross sections. **Figures 2** and **3** provide geologic cross sections that illustrate the site and the approximate boundaries of the former lagoon area that has been backfilled with clay soils.

The results obtained from these additional 14 soil borings confirm the SCM features previously described in the April 30, 2012 investigation letter report. In particular, the following aspects of DNAPL occurrences are noted from the evaluation of the additional investigation work:

- Former lagoon area is backfilled with compacted clay soils to depths ranging from 5ft (GP-11) to 17 ft (GP-17) below grade.
- Sheen is occasionally observed in clay soil, backfilled areas, and natural soils in thin wet sandy silty lenses and in clay soils (GP-6, GP-10, GP-16, GP-49, and GP-25).
- DNAPL ganglia are occasionally observed in thin wet sandy lenses (2-3 ft thick) and in naturally occurring silty clay soils beneath the backfilled lagoon area (GP-48, GP-49, GP-10 and GP-16).
- No pooled DNAPL was observed in any of the additional soil borings.

Mr. W. Owen Thompson United States Environmental Protection Agency May 24, 2012 Page 3 of 4

2.0 Conclusions

As a result of conducting additional soil borings at the Detrex facility, the following conclusions have been developed regarding the distribution and occurrence of impacted soil, impacted groundwater, and DNAPL impacts:

- Soil borings completed in May 2012, once again confirm previous reported subsurface conditions (i.e. low permeability clay soils overlying lower permeability glacial till deposits, and the presence of perched groundwater encountered at approximately 10-15 ft bgs with low yield).
- When DNAPL is observed, it is found in discontinuous cracks/voids in backfill clay soils; sheen in thin wet silty/sandy lenses; and as ganglia in discontinuous wet silt/sand lenses typically less than 2-3 ft thick.
- There is no evidence of thick/extensive zones or layers DNAPL anywhere on site.
- DNAPL is observed in wet sandy lenses beneath (20-25 ft bgs) the former lagoon area in the vicinity of the existing DNAPL recovery well array and in the depth interval of the existing well screens (i.e. 20-30 ft bgs).
- The fine grained, low permeability silty clay soil and discontinuous thin sand lenses on site are not conducive for extracting significant quantities of either groundwater or DNAPL impacted fluids. The presence of these fine grained silty clay soil and low water yielding explain the difficulties that the existing vacuum extraction system has had in operations.
- The subsurface conditions observed in all soil borings indicate that the subsurface materials are not typical of aquifers, but rather aquitards. As a result, groundwater and DNAPL will not readily migrate from the source area and have limited vertical and lateral mobility.
- The occurrence of DNAPL and DNAPL ganglia in thin lenses, at multiple depths in clay backfill and natural silty clay soils presents difficulty for removal using vertical well screens in boreholes.

3.0 Path Forward and Recommendations

Based on the findings of this investigation and the MIP investigation submitted on April 30, 2012, the following recommendations are provided for consideration.

• The DNAPL recovery well design proposed by FBAG is not appropriate for the geologic conditions and the DNAPL occurrence patterns at the Detrex site.

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- Since there are no thick extensive zones or layers of DNAPL anywhere and the site soils are dominated by clays and silts, the use of vertical recovery wells to recover DNAPL from discontinuous zones seems impractical as supported by difficulties in the operation of the existing recovery system.
- The data collected during the past several years indicates that the occurrence of DNAPL has been adequately defined and that alternative methods other than verified recovery wells should be considered in order to optimize the recovery of any potentially mobile DNAPL for long term DNAPL recovery.

As a result of these findings, Detrex is requesting a meeting with USEPA to further review the data that has been collected and consider the steps necessary to further assess an Explanation of Significant Difference (ESD) or ROD Amendment for the current Source Control remedy that is currently in place.

We look forward to hearing from you soon to arrange the meeting. If you have any questions regarding the information provided in this letter report, please do not hesitate to contact me at 216-622-2432 or Tom Steib at 440-997-6131 at your convenience.

Sincerely,

URS Corporation - Ohio

Martin L. Schmidt, Ph.D.

Vice President

cc:

R. Currie – Detrex Corporation

T. Doll - Detrex Corporation

P. Felitti, U.S. EPA

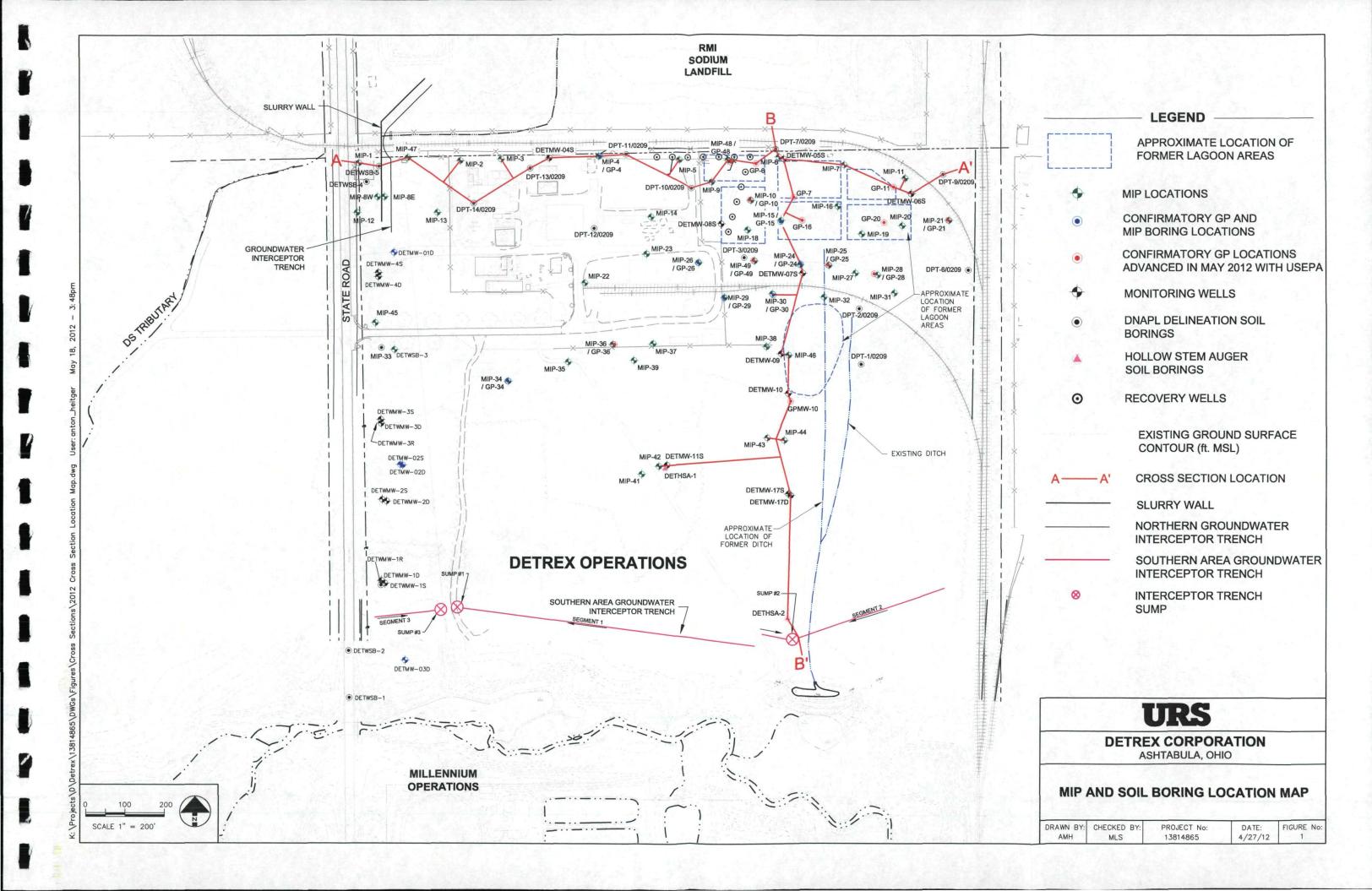
Marly Schilt

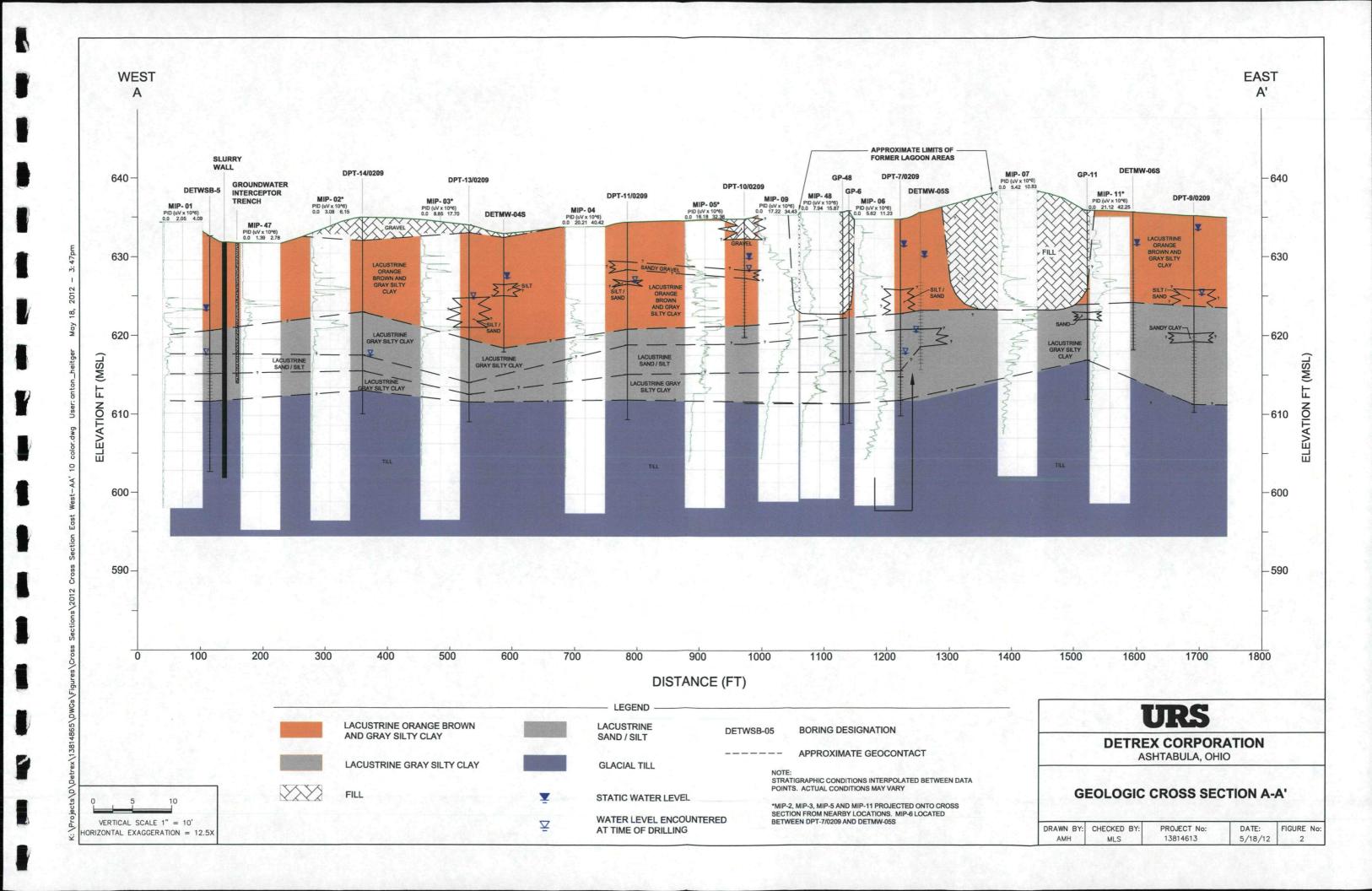
T. Steib – Detrex Corporation

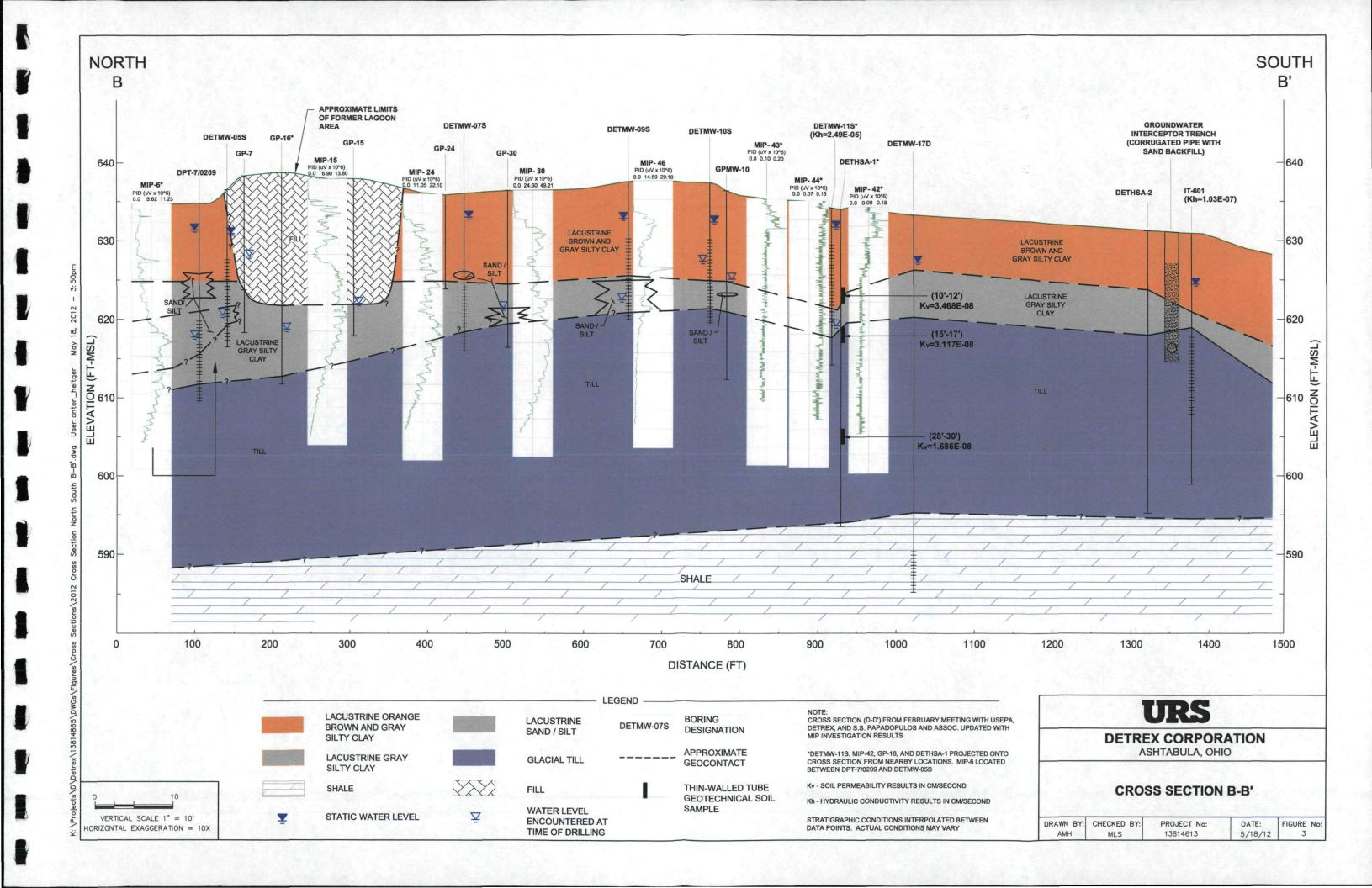
R. Williams - Ohio EPA

W. Earle - SulTRAC

FIGURES







APPENDICES

APPENDIX A
HISTORICAL AIR PHOTOGRAPH



APPENDIX B INDIVIDUAL BORINGS

BORING LOGS (IN LAGOON AREA)

Project: Detrex MIP Confirmatory Borings
Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Key to Log of Boring Sheet 1 of 1

SAMPLES Elevation, feet Recovery, inches Headspac MATERIAL DESCRIPTION **FIELD NOTES** Depth, feet Graphic Number 7 8 9 1 2 3 4 5 6

COLUMN DESCRIPTIONS

- 1 Elevation: Elevation in feet referenced to mean sea level.
- 2 Depth: Depth in feet below the ground surface.
- 3 Sample Type: Type of soil sample collected at depth interval shown; sampler symbols are explained below.
- 4 Sample Number: Sample identification number.
- **5** Recovery: Length (in inches) of soil sample actually recovered in the sampler.
- Headspace. ppm MiniRae 11.7eV Photo-lonization
 Detector (PID) reading in headspace of sealable plastic bag
 after several minutes of vapor accumulation.
- 7 <u>Graphic Log:</u> Graphic depiction of subsurface material encountered; typical symbols are explained below.
- **Material Description:** Description of material encountered; may include moisture, color, grain size, and density/consistency.
- 9 Remarks: Comments and observations regarding drilling or sampling made by driller or field personnel.

ATD At Time of Drilling
NR Not Recorded
NA Not Applicable
bgs Below Ground Surface

TYPICAL MATERIAL GRAPHIC SYMBOLS

FILL Clayey SILT
SAND Silty CLAY

Silty SAND CLAY

SILT

TYPICAL SAMPLER GRAPHIC SYMBOLS

Geoprobe Dual Tube Sampler

OTHER GRAPHIC SYMBOLS

First water encountered at time of drilling and sampling (ATD)

Static water level measured using electronic water level indicator

Minor change in material properties within a lithologic stratum

GENERAL NOTES

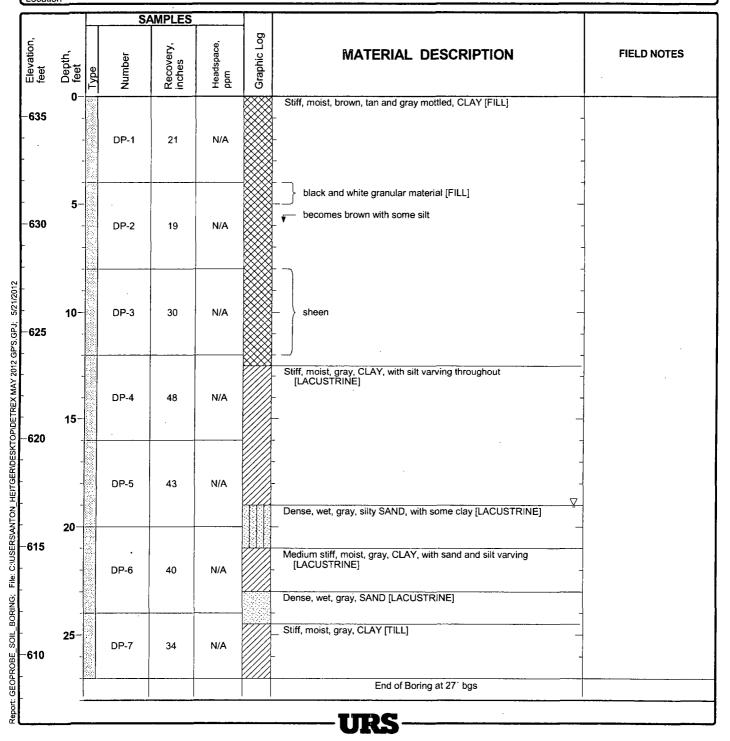
- Soil classifications are based on the Unified Soil Classification System. Descriptions and stratum lines are interpretive; actual lithologic changes may be gradual. Field descriptions may have been modified to reflect results of lab tests.
- Descriptions on these logs apply only at the specific boring locations and at the time the borings were advanced.
 They are not warranted to be representative of subsurface conditions at other locations or times.

Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-6

Date(s) Drilled	5/2/12	Logged By	W. Clayton	Checked By M. Schmidt
Drilling Method	Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole 27.0 feet
Drill Rig Type	Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface 635.9
Groundwa at Time of		4' Dual Tube Sampler	Boring Completion Bentonite Chips	
Boring				

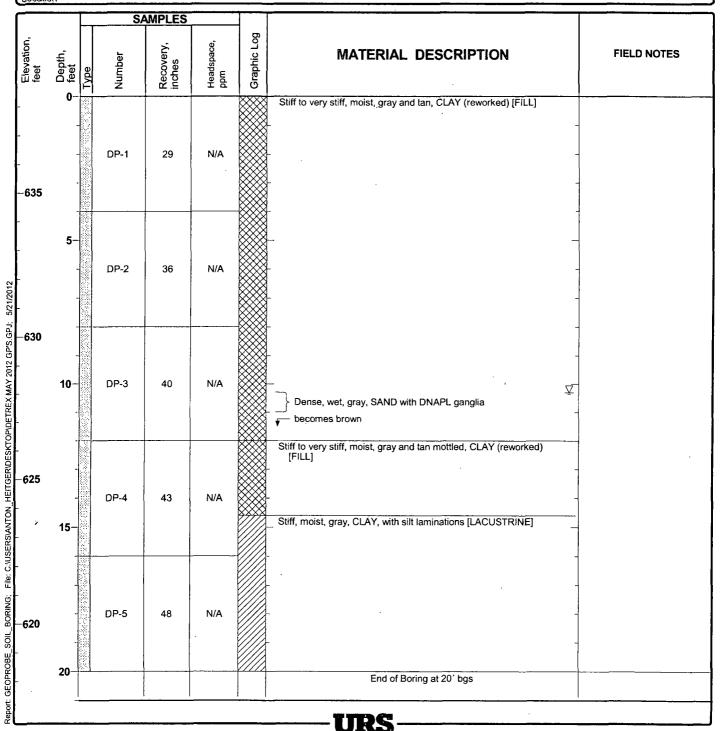


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-7

Date(s) Drilled	5/1/12	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Method	Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	20.0 feet
Drill Rig Type	Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	638.3
Groundwate at Time of D		Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips
Boring Location					

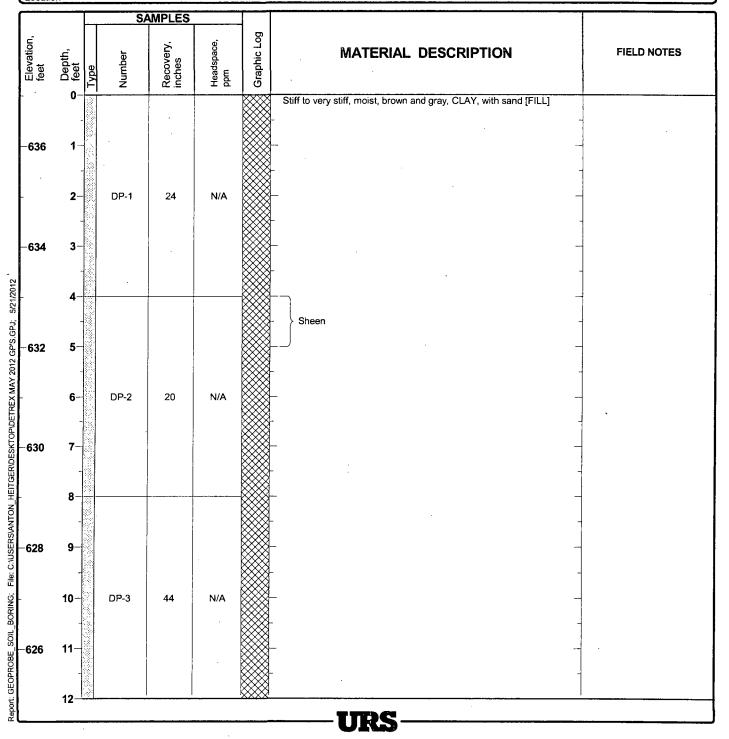


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-10

Date(s) 5/1/12 Drilled	Logged By	W. Clayton	Checked By M. Schmidt
Drilling Method Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole 24.0 feet
Drill Rig Type Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface 637.0
Groundwater Level at Time of Drilling None Encountered ATD	Sampler Types	4' Dual Tube Sampler	Boring Completion Bentonite Chips
Boring Location	·		

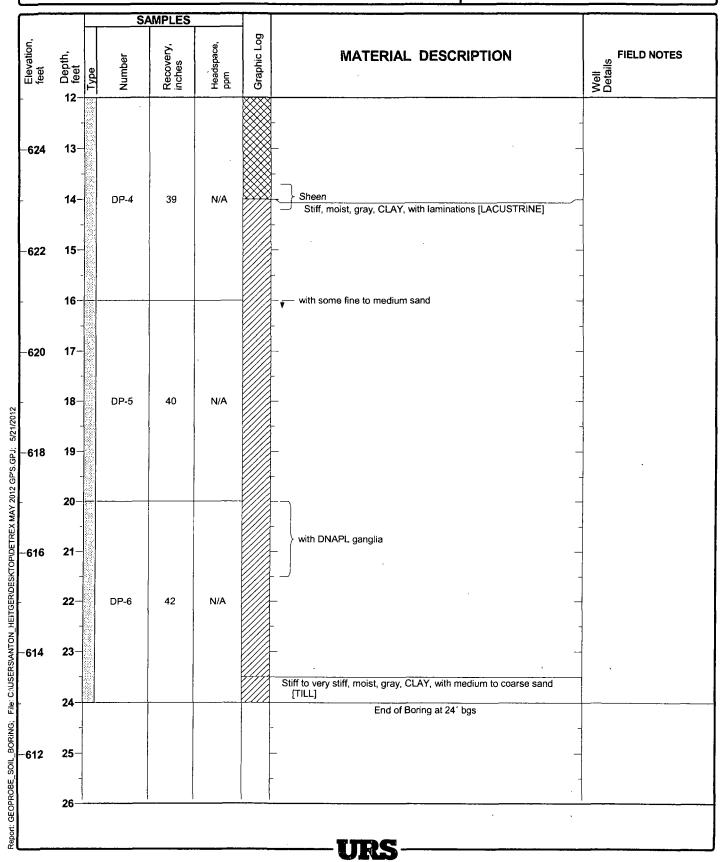


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-10

Sheet 2 of 2



Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-11

Sheet 1 of 1

Date(s) Drilled 5/1/12	Logged By	W. Clayton	Checked M. Schmidt
Drilling Method Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole 24.0 feet
Drill Rig Type Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface 635.9
Groundwater Level at Time of Drilling Approximately 13.0' bgs A	Sampler Types	4' Dual Tube Sampler	Boring Completion Bentonite Chips
Boring Location			

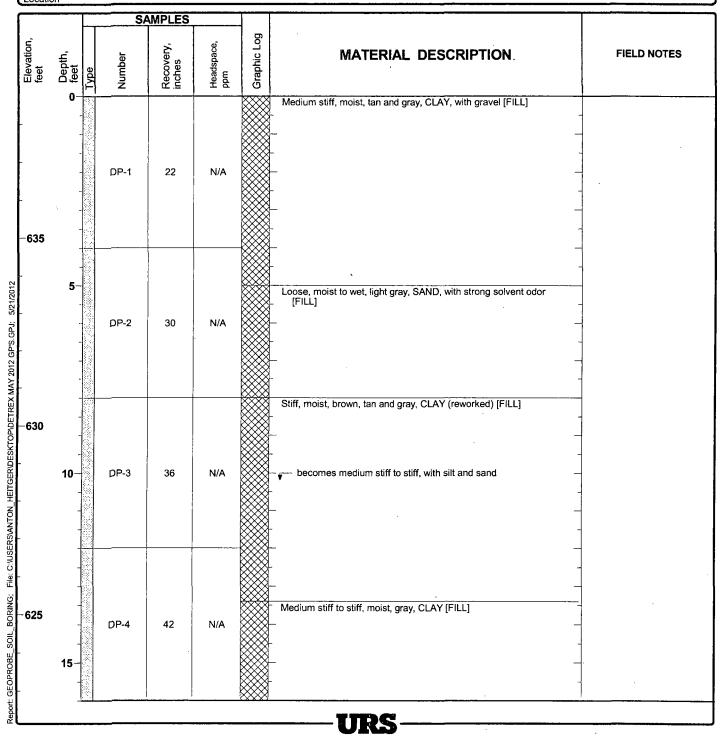
SAMPLES Graphic Log Elevation, feet Recovery, inches FIELD NOTES MATERIAL DESCRIPTION Number Stiff, moist, gray and tan, CLAY (reworked) [FILL] 635 DP-1 N/A 32 becomes medium stiff Loose, moist, brown, SAND [FILL] 630 DP-2 20 N/A File: C:USERSYANTON_HEITGER\DESKTOP\DETREX MAY 2012 GP\S.GPJ; 5/21/2012 DP-3 10-28 N/A Stiff, moist, gray, silty CLAY 625 Dense, wet, gray, SAND Medium stiff to stiff, moist, gray, CLAY, with silt laminations and varvings [LACUSTRINE] 46 DP-4 N/A 15 620 DP-5 N/A Stiff to very stiff, moist, gray, CLAY, with medium to coarse sand and fine Gravel [TILL] 20 with streaks of reddish purple Clay Report: GEOPROBE_SOIL_BORING; 615 DP-6 48 End of Boring at 24' bgs

Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-16

Date(s) Drilled	5/1/12	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Method	Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	27.0 feet
Drill Rig Type	Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	638.7
Groundwa at Time of		Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips
Boring Location					

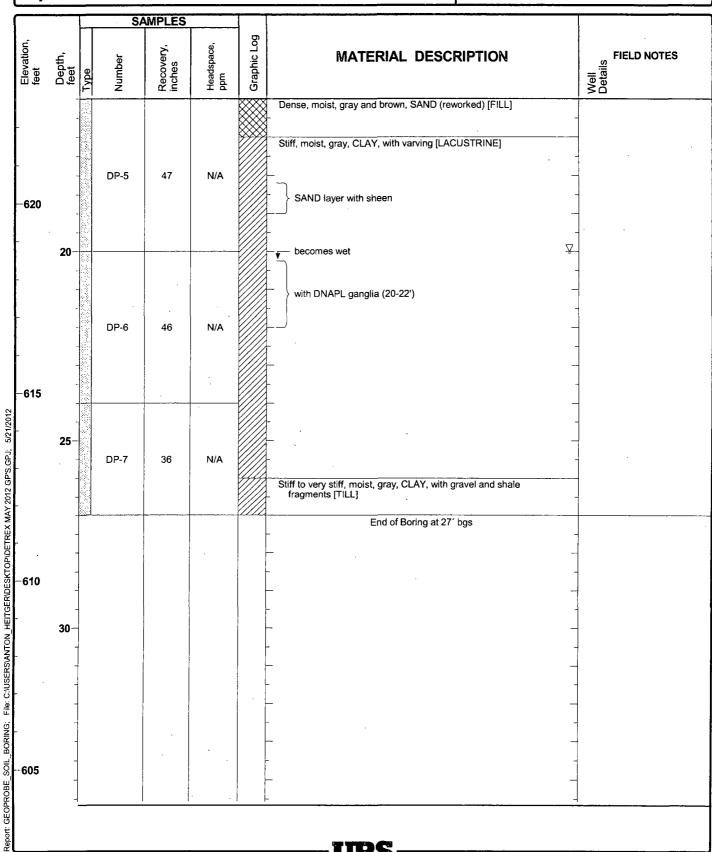


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-16

Sheet 2 of 2



Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-20

Date(s) Drilled	5/2/12	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Method	Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	24.0 feet
Drill Rig Type	Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	637.3
Groundwa at Time of		Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips

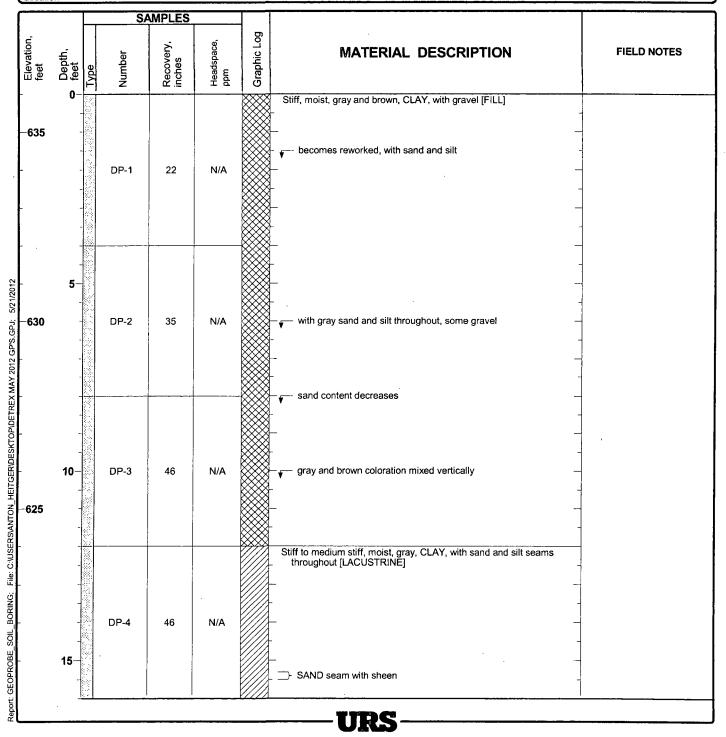
			SA	MPLES				
Elevation, feet	Depth, feet	Type	Number	Recovery, inches	Headspace, ppm	Graphic Log	MATERIAL DESCRIPTION	FIELD NOTES
-	0						Medium stiff, moist, brown, CLAY [FILL] Dense, moist, light gray, SAND [FILL]	
635	-		DP-1	24	N/A		- Deliber, money, many, or the [mee]	
}	-						_ -	
	5-						- -	
-	-		DP-2	24	N/A		_	_
-630								
-	-						Stiff, moist, brown, CLAY [FILL]	
_	10- -		DP-3	48	N/A		becomes gray	-
625	_						· -	
-	-		DP-4	48	N/A		Stiff, moist, gray, CLAY, with sand and silt laminations	
ļ	15-		ı				[LACUSTRINE]	
-625 -620	-						. -	
-620 -	_		DP-5	47	N/A		-	
}	20-						_	
	-						-	
-615 -	-		DP-6	46	N/A		Stiff to very stiff, moist, gray, CLAY, with medium to coarse sand and fine gravel [TILL]	
}	1	<u> 21</u>					End of Boring at 24' bgs	,

Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-25

Date(s) Drilled 5/1/12	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Method Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	27.0 feet
Drill Rig Type Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	636.0
Groundwater Level at Time of Drilling None Encountered ATD	Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips
Boring Location				

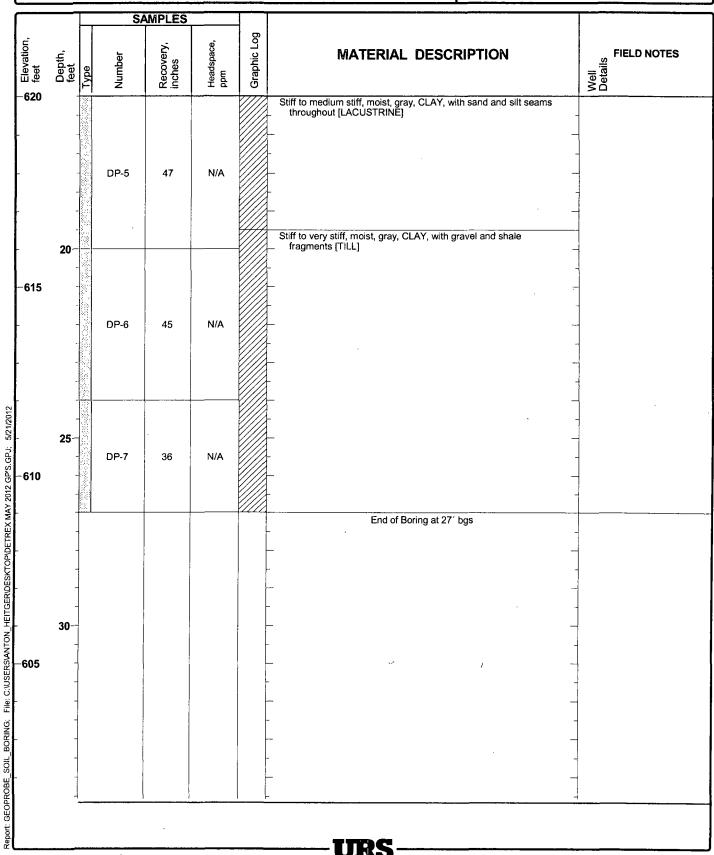


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-25

Sheet 2 of 2

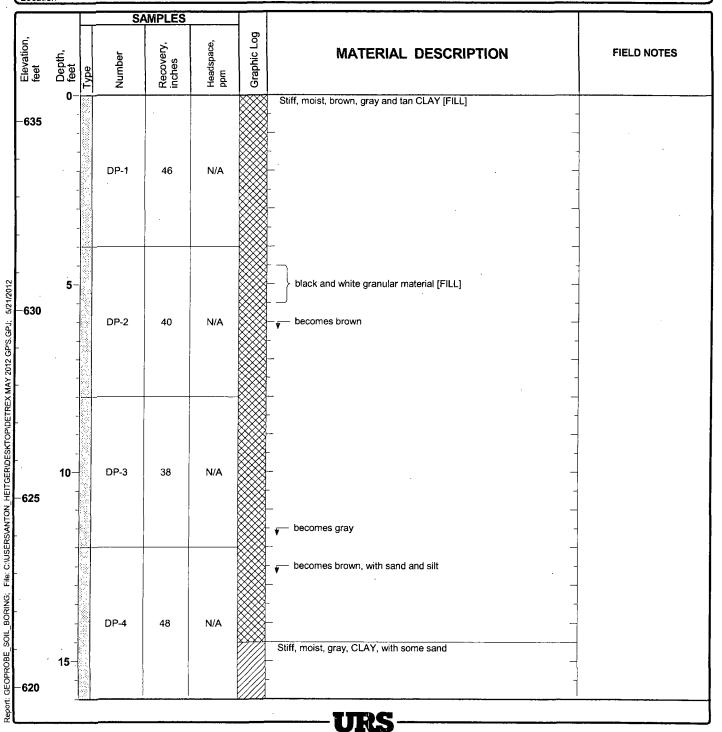


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-48

Date(s) Drilled 5/2/12	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Method Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	27.0 feet
Drill Rig Type Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	635.7
Groundwater Level at Time of Drilling Approximately 17.0' bgs ATD	Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips
at Time of Drilling Boring Location		4' Dual Tube Sampler		Bentonite Chip

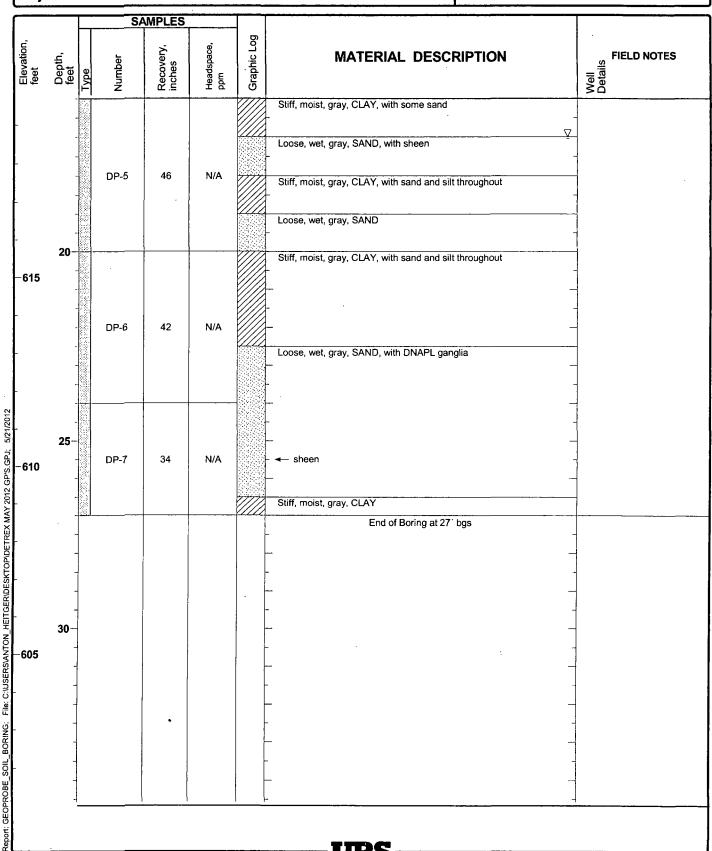


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-48

Sheet 2 of 2

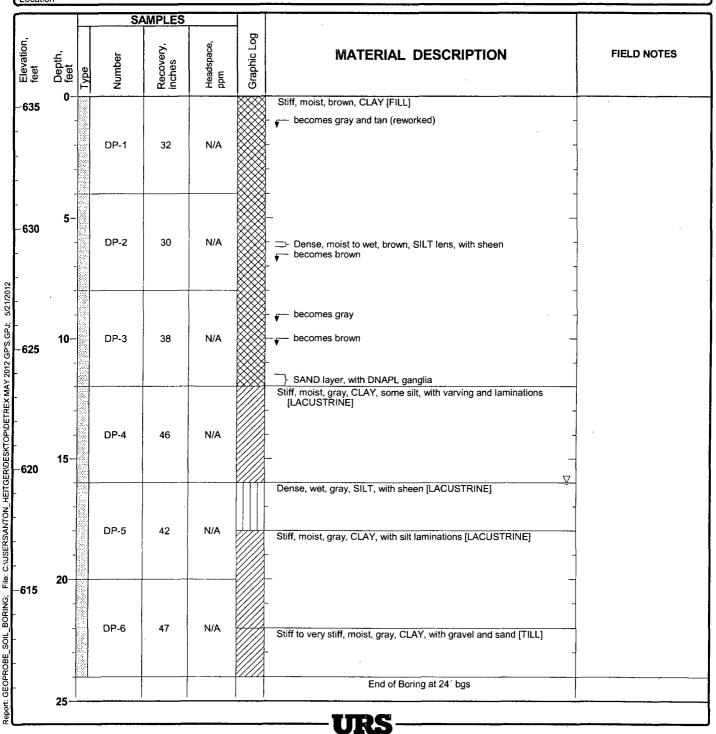


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-49

Date(s) Drilled 5/1/12	Logged By	W. Clayton	Checked M. Schmidt
Drilling Method Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole 24.0 feet
Drill Rig Type Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface 635.4
Groundwater Level at Time of Drilling Approximately 16.0' bgs ATD	Sampler Types	4' Dual Tube Sampler	Boring Completion Bentonite Chips
Boring Location			



BORING LOGS (OUTSIDE LAGOON AREA)

Project: Detrex MIP Confirmatory Borings
Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Key to Log of Boring Sheet 1 of 1

$\overline{}$		SAMPLES			A CONTRACTOR OF THE CONTRACTOR		
Elevation, feet	Depth, feet	Type Number	Recovery, inches	Headspace, ppm	Graphic Log	MATERIAL DESCRIPTION	FIELD NOTES
1	2	3 4	5	6	7	8	9
l							

COLUMN DESCRIPTIONS

- 1 Elevation: Elevation in feet referenced to mean sea level.
- 2 Depth: Depth in feet below the ground surface.
- 3 <u>Sample Type:</u> Type of soil sample collected at depth interval shown; sampler symbols are explained below.
- 4 Sample Number: Sample identification number.
- **8** Recovery: Length (in inches) of soil sample actually recovered in the sampler.
- 6 Headspace. ppm MiniRae 11.7eV Photo-lonization Detector (PID) reading in headspace of sealable plastic bag after several minutes of vapor accumulation.
- 7 <u>Graphic Log:</u> Graphic depiction of subsurface material encountered; typical symbols are explained below.
- 8 Material Description: Description of material encountered; may include moisture, color, grain size, and density/consistency.
- **Remarks:** Comments and observations regarding drilling or sampling made by driller or field personnel.

ATD At Time of Drilling
NR Not Recorded
NA Not Applicable
bgs Below Ground Surface

TYPICAL MATERIAL GRAPHIC SYMBOLS

FILL	Clayey SILT
SAND	Silty CLAY





TYPICAL SAMPLER GRAPHIC SYMBOLS

Geoprobe Dual Tube Sampler

OTHER GRAPHIC SYMBOLS

First water encountered at time of drilling and sampling (ATD)

Static water level measured using electronic water level indicator

Minor change in material properties within a lithologic stratum

GENERAL NOTES

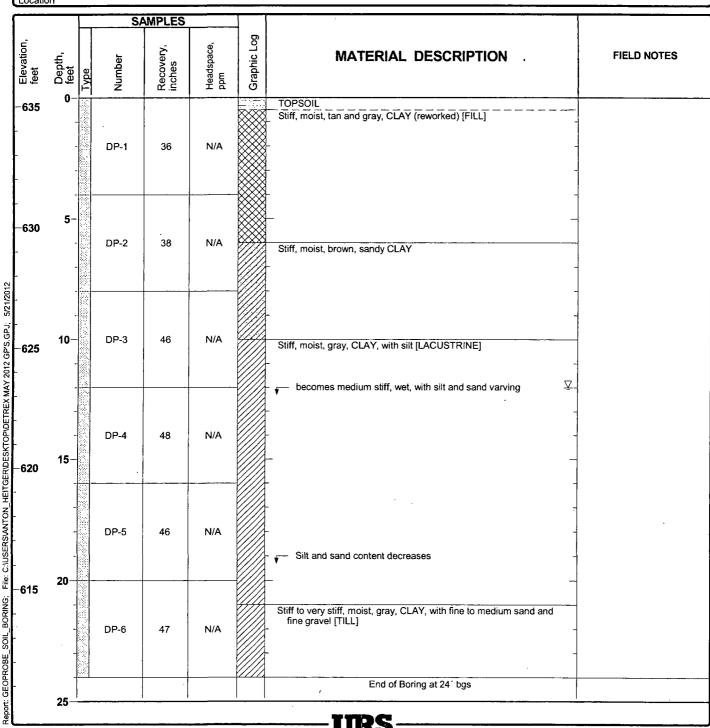
- Soil classifications are based on the Unified Soil Classification System. Descriptions and stratum lines are interpretive; actual lithologic changes may be gradual. Field descriptions may have been modified to reflect results of lab tests.
- Descriptions on these logs apply only at the specific boring locations and at the time the borings were advanced. They are not warranted to be representative of subsurface conditions at other locations or times.

Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-21

Date(s) 5/2/12 Drilled		Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Direct Pus	sh	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	24.0 feet
Drill Rig Type Geoprobe	6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	635.4
Groundwater Level at Time of Drilling	pproximately 12.0' bgs ATD	Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips

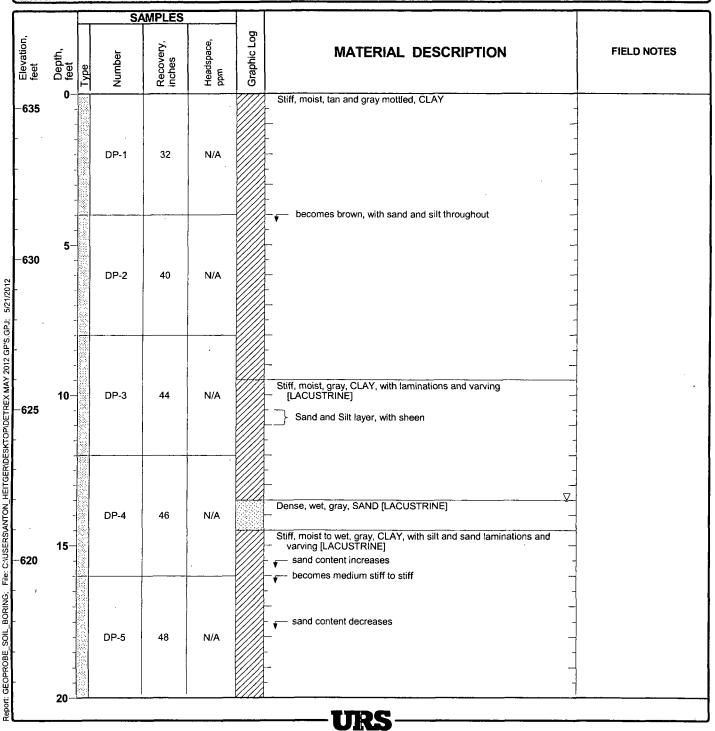


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-28

Date(s) 5/2/1 Drilled	2	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Direct	ct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	
Drill Rig Type Geor	probe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	635.5
Groundwater Levat Time of Drilling		Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips
Boring Location					

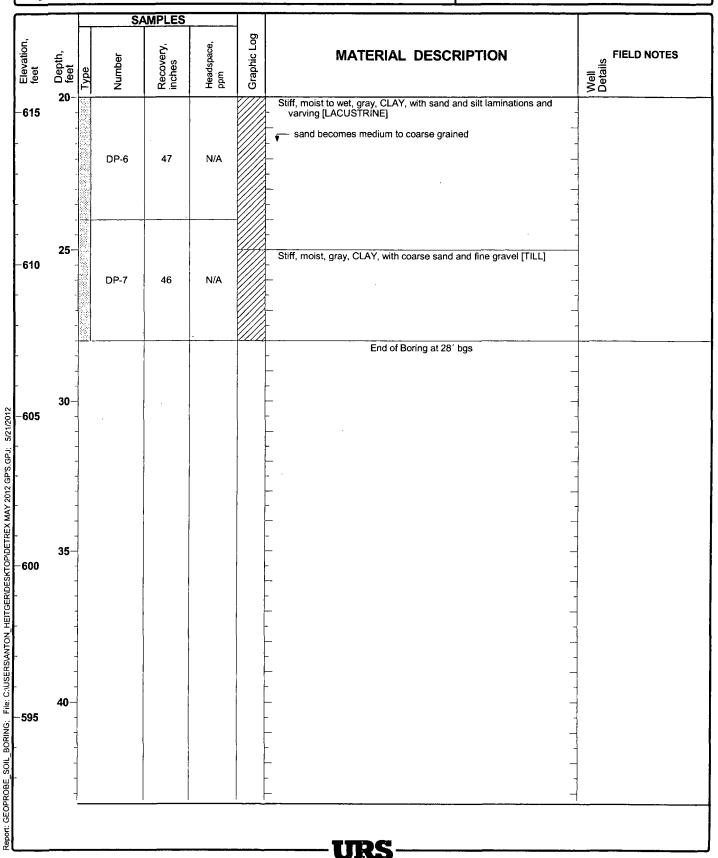


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-28

Sheet 2 of 2

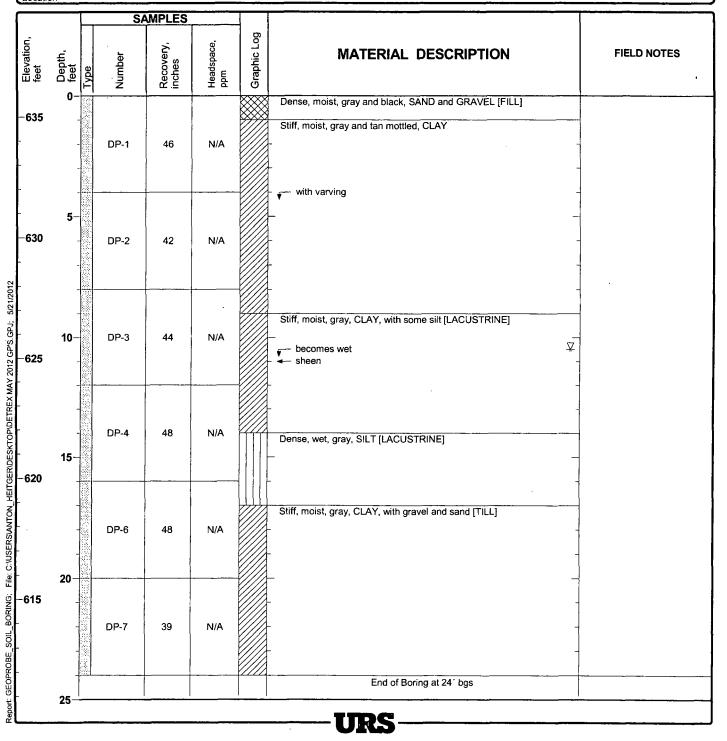


Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GP-36

Date(s) Drilled 5/1/12	Logged By	W. Clayton	Checked By M. Schmidt
Drilling Method Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole 24.0 feet
Drill Rig Type Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface 635.9
Groundwater Level at Time of Drilling Approximately 10.5' bgs ATD	Sampler Types	4' Dual Tube Sampler	Boring Completion Bentonite Chips
Boring Location	1 3 200		Completion



Project Location: 1100 State Road, Ashtabula, OH

Project Number: 13814865

Log of Boring GPMW-10

Date(s) Drilled	5/2/12	Logged By	W. Clayton	Checked By	M. Schmidt
Drilling Method	Direct Push	Drill Bit Size/Type	Dual Tube Geoprobe Sampler	Total Depth of Borehole	24.0 feet
Drill Rig Type	Geoprobe 6620 DT	Drilling Contractor	Frontz Drilling	Surface Elevation	636.3
Groundwa at Time of		Sampler Types	4' Dual Tube Sampler	Boring Completion	Bentonite Chips

